

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

DEREK ANTOL, individually, and as next  
friend for DSA II, DEVON ANTOL  
and TRYSTON ANTOL,

Case No. 1:17-cv-00613

Hon. JANET T. NEFF

Plaintiffs,

ADAM DENT, KATE STRAUS, CASEY  
BRINGEDAHL, CASEY TRUCKS, PETE  
KUTCHES, and WESTERN MICHIGAN  
ENFORCEMENT TEAM, a public body  
organized under the laws of the State of  
Michigan,

Defendants.

---

J. Nicholas Bostic  
Bostic & Associates  
Attorney for Plaintiffs  
909 N. Washington Ave.  
Lansing, MI 48906  
(517) 706-0132  
[barristerbosticlaw@gmail.com](mailto:barristerbosticlaw@gmail.com)

Allan C. VanderLaan (P33893)  
Bradley Charles Yanalunas (P80528)  
Curt A. Benson (P38891)  
Cummings McClorey Davis & Acho PLC  
Attorneys for Defendants Dent, Strauss,  
Bringedahl, & Kutches  
327 Centennial Plaza Bldg.  
2851 Charlevoix Dr., SE  
Grand Rapids, MI 49546  
(616) 975-7470  
[avanderlaan@cnda-law.com](mailto:avanderlaan@cnda-law.com)  
[byanalunas@cnda-law.com](mailto:byanalunas@cnda-law.com)  
[cbenson@cnda-law.com](mailto:cbenson@cnda-law.com)

---

Adam P. Sadowski (P73864)  
John G. Fedynsky (P65232)  
Assistant Attorneys General  
Attorneys for Defendant Casey Trucks  
Complex Litigation Division  
P.O. Box 30736  
Lansing, MI 48909  
(517) 335-3055

[sadowskia@michigan.gov](mailto:sadowskia@michigan.gov)  
[fedynsky@michigan.gov](mailto:fedynsky@michigan.gov)

Douglas M. Hughes (P30958)  
John M. Karafa (P36007)  
Williams Hughes, PLLC  
Attorneys for Defendants Kutches &  
Western MI Enforcement Team  
120 W. Apple Ave.  
P.O. Box 599  
Muskegon, MI 49440  
(231) 726-4857  
[doughughes@williamshugheslaw.com](mailto:doughughes@williamshugheslaw.com)  
[johnkarafa@williamshugheslaw.com](mailto:johnkarafa@williamshugheslaw.com)

---

**BRIEF IN SUPPORT OF DEFENDANT CASEY TRUCKS'  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE REPLY IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

**CONCISE STATEMENT OF ISSUES PRESENTED**

1. Whether the deadline for Defendant Casey Trucks to file a reply in support of summary judgment should be retroactively extended from November 23, 2018 until December 7, 2018?

**CONTROLLING OR MOST APPROPRIATE AUTHORITY**

Federal Rule 16(b)(4) provides that a scheduling order may be modified for good cause and with the judge's consent.

## STATEMENT OF FACTS AND ARGUMENT

The undersigned needs this short extension to file a reply brief in support of Casey Trucks' summary judgment motion. On November 16, 2018, the undersigned's spouse was admitted to the hospital with a life-threatening and unexpected illness that required surgery and a week-long hospital stay to which she is still recovering. With the undersigned's unexpected absence from the office and return to work on November 26, 2018, the reply brief date did not get docketed and the due date had already passed. Because of these issues, the undersigned requests an additional 14 days to file a reply brief in support of Defendant Casey Trucks' motion for summary judgment.

## CONCLUSION AND RELIEF REQUESTED

For the foregoing reasons, Defendant Casey Trucks moves this Court to enter an Order extending the deadline to file the reply brief in support of his motion for summary judgment to December 7, 2018.

Respectfully submitted,

Bill Schuette  
Attorney General

s/Adam P. Sadowski  
Adam P. Sadowski  
Assistant Attorney General  
Attorney for Defendant Casey Trucks  
Complex Litigation Division  
P.O. Box 30736  
Lansing, MI 48909  
(517) 335-3055  
[sadowskia@michigan.gov](mailto:sadowskia@michigan.gov)  
P73864

Dated: November 29, 2018

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 29, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing of the foregoing document as well as via US Mail to all non-ECF participants.

*s/Adam P. Sadowski*

Adam P. Sadowski

Assistant Attorney General

Attorney for Defendant Casey Trucks